

**LOCAL BANKRUPTCY FORM 9013-4**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE:**

Daniel John McLean, Jr. and Tanya Lynn McLean :

CHAPTER 13

CASE NO. 5 - 19 -bk- 01880-MJC

**Debtor(s)**

Nationstar Mortgage LLC d/b/a Mr. Cooper LLC,  
or its Successor or Assignee

ADVERSARY NO.   -  -  ap-    
(if applicable)

**Plaintiff(s)/Movant(s)**

vs.

Daniel John McLean, Jr. and Tanya Lynn  
McLean, Debtors  
Jack N Zaharopoulos, Trustee

Nature of Proceeding: Hearing on Motion

For Relief

**Defendant(s)/Respondent(s)**

Document #: 64

**REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE<sup>1</sup>**

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.<sup>2</sup>

Reason for the continuance.

The parties are trying to settle the motion and need additional time to determine if the matter can be resolved, and are requesting a thirty-day adjournment

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: July 6, 2023

/s/ Andrew M. Lubin

Attorney for Movant

Name: Andrew M. Lubin

Phone Number: 856-833-4808

<sup>1</sup> No alterations or interlineations of this document are permitted.